

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CAIRO HOLDING COMPANY, INC.
Debtor**

**CHAPTER 11
CASE NO. 23-01954-JAW**

**IN RE: CAPPAERT MANUFACTURED
HOUSING, INC.
Debtor**

**CHAPTER 11
CASE NO. 23- 01955-JAW**

**MOTION FOR AUTHORITY TO ESTABLISH SHORTENED
SERVICE AND NOTICE LIST**

COME NOW the Debtor and debtor-in-possession, Cairo Holding Company, Inc. and Cappaert Manufactured Housing, Inc. (the “Debtor”), and files this their Motion for Authority to Establish Shortened Service and Notice List (the “Motion”) , and in support thereof, would show unto the Court the following, to-wit:

1. On August 25, 2023, (the “Petition Date”), the Debtors filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”), thereby initiating the above-captioned bankruptcy case (the “Chapter 11 Case”) as a Subchapter V Debtor. The Debtor continues to manage and operate its business as Debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

2. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. § § 157 and 1334. Venue of this proceeding and this Motion is proper pursuant to 28 U.S.C. § § 1408 and 1409. This Motion has been authorized for consideration on an expedited basis by the Court.

3. A Subchapter V Trustee has not yet been appointed in this Chapter 11 Case.

4. As of their petition date, the Debtor has an estimated aggregate total in excess of 700 creditors.

5. While this is a small business subchapter V case, , it is expected that the amount of small creditors will be significant and, unless provisions are made for alternative noticing arrangements, it will be extremely costly to the estate. The costs of copying, postage and supplies would quickly mount, as would the administrative burdens on the Debtors' professionals required to administer large, repeated mail-outs of routine pleadings to all creditors and interested parties. Furthermore, there are numerous persons included on the Master Matrix that will have little or no interest in and will not be affected by the large majority of pleadings and other matters that will be filed or otherwise regularly arise in their case. Their interest are protected and they are assured of adequately receiving notice of all matters that are of significance to all parties due to the noticing requirements otherwise contained in the Bankruptcy Code and Rules.

6. Thus, the Debtor submits that establishing a Shortened Service and Notice List will alleviate the cost and burdens that would otherwise be imposed upon them without it. This can be effectuated in accordance with the Bankruptcy Rules and will not compromise the due process of concerns of interested parties, all while ensuring that the parties most active in the case are fully informed on a current basis.

7. The Debtors purpose, subject to future additions as requested or directed, that the Shortened Service List include the following persons and their professionals:

- Debtors
- Secured Creditors
- Subchapter V Trustee
- U.S. Trustee
- 20 Largest Unsecured Creditors
- All Relevant Governmental Agencies
- All Parties Requesting Notice

8. In addition to the parties on the Shortened Service and Notice List, any party not listed thereon but directly affected by a request for relief shall be provided notice of any pleading or

notice with respect thereto.

9. The Debtor purposes to update the Shortened Service and Notice List on a weekly basis for the first 30 days of this case, on a bi-monthly basis for the next 30 days of this case and on a monthly basis thereafter, and the Debtor will file the initial and updated Shortened Service and Notice List with the Court and serve them on all parties listed thereon.

10. A reduced and shortened notice and service list will achieve substantial savings but will provide adequate notice.

WHEREFORE, the Debtor respectfully request that, pursuant to § § 102(a) and 105 and Rules 2002(m) and 9007, the Court enter an Order authorizing the establishment of a Shortened Service and Notice List as set forth herein and for such other relief as the Court deems appropriate and just.

Respectfully submitted this the 25th day of August, 2023.

**CAIRO HOLDING COMPANY, INC.
and CAPPAERT MANUFACTURED
HOUSING, INC.**

By Its Attorney,

J. WALTER NEWMAN IV

/s/J. Walter Newman IV
J. WALTER NEWMAN IV

J. Walter Newman IV, MSB# 3832
NEWMAN & NEWMAN
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Ridgeland, MS 39157
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Attorney for Debtor

CERTIFICATE OF SERVICE

I, J. WALTER NEWMAN IV, attorney for Debtor, do hereby certify that I have this date transmitted *via* Electronic Case Filing, as it appears on this date in the Court registered e-filers of CM/ECF and/or *via* U. S. Mail, postage prepaid, a true and correct copy of the foregoing Pleading to the following:

Office of the United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

THIS, the 25th day of August, 2023.

/s/J. Walter Newman IV
J. WALTER NEWMAN IV

SCHEDULE 1

Notice Parties

Office of the United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

Subchapter V Trustee

Legacy Capital
Chip Porter
cporter@legacycapital.com

Secured Creditors

Channel Partners Capital LLC
10900 Wayzata Blvd., #300
Hopkins, MN 55305

Navitas Credit
203 Fort Wade Road
Ponte Vedra, FL 32081

RiverHills Bank
1400 Hwy 61 N
Vicksburg, MS 39183

United States Attorney
Cynthia Eldridge for USDA and IRS
501 E. Court Street
Suite 4.430
Jackson, MS 39201-5025

Government and State Agencies

Internal Revenue Service
Ogden, UT 84201-0039

U.S. Securities and Exchange Commission
Atlanta Regional Office
950 East Paces Ferry Road, N.E.
Suite 9
Atlanta, GA 30326-1180

Mississippi Department of Revenue
Bankruptcy Division
P. O. Box 22808
Jackson, MS 39225-2808

Mississippi Department of Revenue
P. O. Box 23192
Jackson, MS 39225

Warren County Tax Collector
1009 Cherry Street
Vicksburg, MS 39180

20 Largest Unsecured Creditors

Wesco
P. O. Box 530409
Atlanta, GA 30353-0409

Patrick Industries, Inc.
P. O. Box 77471
Minneapolis, MS 55485-4701

Dynamic Capacity Group
P. O. Box 467
Irwin, PA 15642

Ace Tire & Axle
16474 County Road 426
Phil Campbell, AL 35581

Gerdau Long Steel
300 Ward Road
Midlothian, TX 76065

Service Partners LLC
P. O. Box 746945
Atlanta, GA 30374-6945

Capital Preservation Services LLC
213 Katherine Drive
Flowood, MS 39232

UFP Distribution
2701 Ada Drive
Elkhart, IN 46514

Basic Components, Inc.
1201 S Second Avenue
Mansfield, TX 76063

Nortek Global HVAC LLC
P. O. Box 405889
Atlanta, GA 30384-5889

Chase Bank
P. O. Box 94014
Palatine, IL 60094-4014

Woodgrain Milwork
P. O. Box 202637
Dallas, TX 75320-2637

Fastening Solutions, Inc.
P. O. Box 161842
Atlanta, GA 30321-1842

Union Corrugating Co.
Dept 5918
Birmingham, AL 35246-5918

Knauf Insulation Inc.
25767 Network Place
Chicago, IL 60673-1257

Electrolux/Frigidaire
P. O. Box 2638
Carol Stream, IL 60132-2638

Employee Mutual Casualty Co.
P. O. Box 5001
Villa Park, IL 60181-5001

Hilti Inc.
P. O. Box 650756
Dallas, TX 75265-0756

Mid South Lumber & Supply
4925 Highway 61 South
Vicksburg, MS 39180